

## **REMARKS**

This Amendment is submitted in response to the Office Action dated September 15, 2006, having a shortened statutory period set to expire December 15, 2006.

### **CLAIM REJECTIONS UNDER U.S.C. § 101**

On page 2 of the present Office Action, second paragraph, Claims 13 is rejected under 35 U.S.C. 101 as being directed to non-statutory subject matter. In response, Applicant has amended Claim 13 and its dependent claims to place Claim 13 in statutory form and overcome the § 101 rejection.

### **CLAIM REJECTIONS UNDER U.S.C. § 112**

On page 2 of the present Office Action, second paragraph, Claims 1-18 are rejected under 35 U.S.C. 112 as being indefinite for failing to particularly point out and distinctly claim the subject matter regarding the invention. In particular, the Examiner objects to the use of the term “multi-cycle” in Claims 1, 7 and 13 as indistinct and the use of the term “regular expression” in Claims 2, 8 and 14 as indefinite.

In response, Applicant has amended Claims 1, 7 and 13 to recite “multi-cycle simulation” as “multi-cycle simulation of the digital design in which multiple simulator cycles are utilized to model each functional cycle of operation of the digital design.” Applicant further respectfully traverses the objection to Claims 2, 8 and 14 because the regular expression is definite and sufficiently well-known in the computing arts to warrant the following definition in Wikipedia ([www.wikipedia.org/wiki/Regular\\_expression](http://www.wikipedia.org/wiki/Regular_expression)):

#### **Regular Expression**

From Wikipedia, the free encyclopedia

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In computing, a regular expression (abbreviated as regexp or regex, with plural forms regexps, regexes, or regexen) is a string that describes or matches a set of strings, according to certain syntax rules. Regular expressions are used by many

text editors and utilities to search and manipulate bodies of text based on certain patterns. Many programming languages support regular expressions for string manipulation. For example, Perl and Tcl have a powerful regular expression engine built directly into their syntax. The set of utilities (including the editor sed and the filter grep) provided by Unix distributions were the first to popularize the concept of regular expressions.

In view of the amendments to Claims 1, 7 and 13 and the definitional evidence of record that the terminology of Claims 2, 8 and 14 is definite, Applicant respectfully submits that the rejection of Claims 1-18 under 35 U.S.C. § 112 is overcome.

### **CLAIM REJECTIONS UNDER U.S.C. § 102**

In paragraph 10 of the present Office Action, Claims 1-18 are rejected under 35 U.S.C. 102(e) as unpatentable in view of U.S. Pub. No. 2005/0050509 to *Fields, Jr. et al. (Fields)*. That rejection is respectfully traversed, and favorable reconsideration of the claims is requested.

Applicant respectfully submits that exemplary Claim 1 is not rendered unpatentable by *Fields* because that reference does not identically disclose each feature of the claimed invention as required to support a rejection under 35 U.S.C. § 102(e). For example, *Fields* does not disclose the following step of exemplary method Claim 1:

in response to receipt of the configuration database and said control file, processing said configuration database with reference to said control file to insert within said configuration database at least one latch data structure and to associate, within said configuration database, the at least one latch data structure with the instance of the Dial entity.

With reference to the foregoing step of Claim 1, paragraph 11 of the present Office Action cites configuration database 814 of *Fields*' Figure 8 as teaching the claimed configuration database and further cites paragraph 0038 of *Fields*, which discloses:

The present invention discloses a configuration specification language and associated methods, systems, and program products for configuring and controlling the setup of a digital system (e.g., one or more integrated circuits or a simulation model thereof). In at least one embodiment, configuration specifications for signals in the digital system are created in HDL code by the designer responsible for an associated design entity. Thus, designers at the front

end of the design process, who are best able to specify the signal names and associated legal values, are responsible for creating the configuration specification. The configuration specification is compiled at model build time together with the HDL describing the digital system to obtain a configuration database that can then be utilized by downstream organizational groups involved in the design, simulation, and hardware implementation processes.

While the cited passage of *Fields* discloses processing HDL files to obtain *Fields*' configuration database 814, the cited passage of *Fields* (and the remainder of the reference) does not disclose any processing of configuration database 814, and in particular, does not disclose "processing said configuration database with reference to said control file to insert within said configuration database at least one latch data structure and to associate, within said configuration database, the at least one latch data structure with the instance of the Dial entity," as recited in exemplary Claim 1. Because *Fields* does not identically disclose each step recited in exemplary Claim 1 as required for a rejection under 35 U.S.C. § 102(e), Applicant respectfully submits that the rejection of exemplary Claim 1, similar Claims 7 and 13 and their respective dependent claims under 35 U.S.C. § 102(e) is overcome.

Applicant further notes that 35 U.S.C. § 103(c) precludes the use of *Fields* in a rejection under 35 U.S.C. § 103, given the citation of *Fields* under 35 U.S.C. § 102(e) and its common ownership with the present application (as evidenced by the assignment records of the USPTO).

Having now responded to each rejection set forth in the present Office Action, Applicant believes all pending claims are now in condition for allowance and respectfully requests such allowance.

No additional fee is believed to be required. If, however, any additional fees are required, please charge those fees to IBM Corporation Deposit Account No. 09-0447.

Respectfully submitted,

A handwritten signature in cursive script, reading "Brian F. Russell". The signature is written in dark ink and is positioned above the printed name.

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